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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VERIGY US, INC, a Delaware Corporation

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual,
 WESLEY MAYDER, an individual,
 SILICON TEST SYSTEMS, INC. a
 California Corporation, SILICON TEST
 SOLUTIONS, LLC, a California Limited
 Liability Corporation, inclusive,

Defendants.

Civil Case No.: C07-04330 RMW (HRL)

**DECLARATION OF ROMI OMAR
 MAYDER IN SUPPORT OF OSC RE:
 CONTEMPT**

Hearing Date: April 11, 2007
 Time: 9:00
 Dept.: Judge: Hon. Judge Whyte

PUBLIC (REDACTED) VERSION

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1 I, Romi Omar Mayder, declare as follows:

2 1. I am a defendant in this case and have personal knowledge of the all facts set forth in this
3 declaration and, if called upon to testify in this Court as to those facts, my testimony would be as
4 stated herein.

5 2. On about July 6, 2007 I received a cease and desist letter from Jay Fowler of Bergeson, LLP
6 on behalf of Verigy, USA Inc. accusing me of misappropriating Verigy trade secrets.

7 3. On July 18, 2007 I, and my attorneys, met with Verigy and their attorneys to discuss how this
8 conflict might be resolved. Shortly thereafter, I agreed not to destroy any potential evidence in the
9 case and make backup copies of the potentially relevant disk drives.

10 4. [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]

17 [REDACTED] I was hopeful that
18 I could resolve this dispute with Verigy quickly, without the need for litigation.

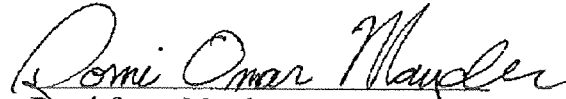
19 6. On or before August 28, 2007 I was informed that Verigy had filed a complaint and that this
20 Court had issued a Temporary Restraining Order ("TRO") against Defendants.

21 7. After reviewing the publicly available TRO, I asked Dr. Richard Blanchard to give me an
22 objective opinion on whether Flash Enhancer contained any Verigy trade secrets. Dr. Blanchard
23 signed the protective order, reviewed the TRO, Verigy's moving papers, and STS documents related
24 to Flash Enhancer. After his review of the documents and a substantial discussion of my knowledge
25 of the facts, Dr. Blanchard's objective opinion was that Flash Enhancer contained no trade secrets.
26

1 8. I hired Dr. Blanchard to testify as an expert witness in this case. I am informed and believe
2 that Dr. Blanchard's declaration, submitted in prior motions to this court, affirms his initial opinion,
3 that Flash Enhancer does not contain any Verigy trade secrets.

4 9. [REDACTED]
5 [REDACTED]
6 [REDACTED]

7
8 I declare, under penalty of perjury under the laws of the State of California, the foregoing is
9 true and correct. Executed this 21st day of March 2008, in San Jose, California.

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11 
12 Romi Omar Mayder
13 Defendant
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EXHIBIT A
FILED
UNDER
SEAL